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Rose, Sharon

From: Don Mitchell <don.mitch@hotmail.com>
Sent: Monday, April 30, 2018 7:54 PM
To: Rose, Sharon
Subject: 01 (Mitchel)--WMA Forest Habitat Enhancement Project.
Attachments: Montana FWP letter.docx

Categories: 1b--EAs & Sign-ups

Sent from Mail for Windows 10

April 30, 2018

Region 2 FWP

Attn: Sharon Rose

3201 Spurgin Road

Missoula, MT 59804

Sharon,

Thank you for sending the DEA on the Nevada Lake WMA Enhancement Project. My name is Don Mitchell and my wife Chris and I own a cabin just south of the Nevada Creek Reservoir facing the WMA. I have hiked, hunted and picked sheds in the WMA for many years and know that country like the back of my hand.

My concern isn't anything the FWP is proposing to do but is the lack of attention being given to the Knapweed problem in the total WMA. The Knapweed has become so prevalent in the WMA parks, it is destroying the feed needed to sustain the elk herd.

I do notice the equipment will be washed and herbicide will be used in the areas worked. I believe more could be accomplished for the animals in the Wildlife Management Area with a stronger knapweed attack.

Sincerely,

Don Mitchell

don@hotmail.com

406-544-2247

Rose, Sharon

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From: scottbreum@aol.com
Sent: Friday, May 4, 2018 9:32 AM
To: Rose, Sharon
Subject: 02 (Breum)--Nevada lake

Categories: 1b--EAs & Sign-ups

Sharon,

I just went over the EA for the Nevada lake management area, I have a cabin directly across the lake from the management area and think your proposal looks good to me. I notice that this area is used extensively during the winter by elk and deer and think that your plan would enhance the use by wildlife.

Scott Breum

Scott Breum Photography
www.scottbreum.com
406.728.6277

[Scott Breum Photography Facebook Page](#)

dare to be DIFFERENT...

Link to Adobe Reader (for PDF files)... [Adobe Reader](#)

Rose, Sharon

#3

From: Marketa Kittrellova <marketakit@gmail.com>
Sent: Wednesday, May 23, 2018 12:09 PM
To: Rose, Sharon
Subject: 03 (Kittrellova)--Comments from an adjacent landowner

To whom it may concern, after reading the Draft Environmental Assessment that was sent to us we would like to be on record as supporting actions that will enhance wildlife habitat in the area. We are not opposed to logging where it is deemed necessary but we would expect all the slash piles to either be removed or burned shortly after the logging operation ceases, not to be left for a potential prescribed burn in the future. We understand that this potential logging operation will help prevent a catastrophic fire event but will also believe that removing Douglas fir trees will also degrade the beauty of the forest. We are not experts on forests or what is best for wildlife but we hope that any future decisions made regarding this section of Nevada Lake FMA will be what is truly best for the environment not just a way to generate some income from the harvesting of timber. Thank you for allowing us to have some input. Sincerely, Carl and Marketa Kittrell and Family

Rose, Sharon

#4

From: George Ochenski <ochenski@mt.net>
Sent: Thursday, May 24, 2018 12:36 PM
To: Rose, Sharon
Subject: 04 (Ochenski)--Nevada Lake WMA Comments

Hi Sharon -

Please include my comments below on the proposed forest treatments for the Nevada Lake WMA. Thanks! - George Ochenski, Helena, Montana

I would like to submit my **opposition** to the planned forest and vegetation treatments at the Nevada Lake WMA for the following reasons:

1. Although the EA states that thinning understory growth, logging Doug Fir and Ponderosa Pine will restore "historic" conditions to the area, it provides no scientific evidence for this assertion. "Historic" conditions should be documented if considered the driving factor for the proposed commercial logging -- which it is -- to raise "revenue" for the agency.
2. Although the EA states that the land proposed for logging and thinning are in compliance with the Nevada Lake Wildlife Management Area (NLWMA) Interim Management Plan, it seems to have ignored the mandate that "Adverse impacts on other resources such as fisheries, riparian habitats, water quality, native plant communities, and other animal populations will be avoided or mitigated."

The problem is evident in the photos provided in the EA and if the understory brush is removed, it will obviously impact lynx habitat since snowshoe hare, the primary prey of lynx, do not prefer "open stand conditions." Considering that the Nevada Lake area is federally designated "critical habitat" for lynx (see https://www.fws.gov/mountain-prairie/es/species/mammals/lynx/CHFinalRule2014/Lynx_CH_Unit3_2014.pdf) slashing out the undergrowth is exactly the wrong thing to do and quite opposite what the agency is supposed to be doing -- which is taking care of fish and wildlife, not providing logs for timber mills or turning natural forests with natural undergrowth into park-like "historic" conditions.

Here's what FWP's own website (fwp.mt.gov/fwpDoc.html?id=78779) has to say about the importance of NLWMA to lynx:

*Nevada Lake Wildlife Management Area Addition
Purpose: The Nevada Lake WMA provides critical winter habitat for elk and deer and is frequented by grizzly bears, as well as many other wildlife species. **The WMA also serves as a linkage for Canada Lynx and other wildlife***

between the Helena National Forest and the Garnet Mountains.

This 760-acre addition to the WMA establishes a legally accessible connection between the WMA

and National Forest, substantially enhancing public recreation and hunting opportunities. Acquiring these parcels helped protect the ecological integrity of the WMA by eliminating the possibility of residential development or other type of habitat conversion above the WMA, which would have directly diminished the WMA's habitat values. The addition also includes about a half mile of Chicken creek, an important tributary for westslope cutthroat trout.

Nor does the proposed thinning and logging enhance conditions for thermal cover that's vitally necessary to deer and elk during Montana's long and cold winters. Again, quite the opposite. Opening up the canopy and getting rid of the underbrush instead enhances the ability of wind and snow to penetrate the winter range, providing greater, not less, stress on deer and elk.

3. FWP is behind the ball on fire science. Claiming that thinning and logging is going to "reduce fire and beetle risk" is simply not defensible in light of current science that actually finds the opposite. Sure, you can cut down the forest, but in doing so, especially simply by "spacing" remaining trees means you will likely be taking out trees that have natural genetic resistance to beetles. And there's no current science that supports thinning or logging have any effect on fire risk whatsoever. Wildfires have burned through clearcuts near Seeley Lake and current studies find already dead trees to be less of a risk for crown fires than live trees with their pitch-filled green needles. And once again, FWP provides no supporting documentation for the EA's claim that "the shade-tolerant conifer understory...makes the remnant ponderosa pine vulnerable to intense stand-replacement crown fires." Similarly, there is no documentation or references provided for the assumption that "dead and dying trees further increase the risk of intense stand-replacement fire on the WMA and could potentially damage winter range conditions for deer and elk." Given that these are fire-adapted forests, it's no surprise FWP provided no scientific references for its opinion, because there are none. Fires have come and gone in the Northern Rockies for eons and somehow deer and elk -- and the forests -- are still here.

Finally, since when is it FWP's mission to make money by selling off public forest resources? The "forest health" excuse has already been disproved by current science, there are no "500 homes" within miles and miles of Nevada Lake, and burning understory merely removes natural ecosystems that are not dictated by merchantable timber. Remember, this is a "wildlife" management area -- not a tree farm and equally not only for huntable wildlife like deer and elk.

Thanks for the opportunity to comment, but really, it's time for FWP to do its homework on forest ecology and fire science before shipping out proposals like this for public review and comment.

George Ochenski
Helena, Montana

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